

The Honorable Ricardo S. Martinez  
The Honorable S. Kate Vaughan

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CAROL STEPIEN,

Plaintiff,

V.

NATIONAL OCEANIC AND  
ATMOSPHERIC ADMINISTRATION, an  
Agency of the United States, and  
DEPARTMENT OF COMMERCE,

## Defendants.

Case No. C21-1166-RSM-SKV

## JOINT STIPULATION AND MOTION

NOTED FOR CONSIDERATION:  
November 29, 2022

## **JOINT STIPULATION AND MOTION**

Pursuant to the parties' previous stipulation and this Court's Order, Dkt. 25, the parties submit this joint status report regarding efforts to reach a resolution in the above-captioned case brought pursuant to the Freedom of Information Act ("FOIA"). The parties previously agreed to work cooperatively to attempt to resolve this litigation without motion practice. Defendants are working towards completing their rolling FOIA productions. The parties propose to continue to meet and confer regarding the FOIA exemptions Defendants have asserted, as needed. Defendants are working in good faith to complete their FOIA release in response to the FOIA requests at issue in this litigation by on or about January 15, 2023. Shortly thereafter the parties will confer on a

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1 briefing schedule if necessary, or determine if the matter can be resolved without motion practice.

2 Therefore, the parties agree and stipulate to continue to work cooperatively towards resolution.

3 The parties propose to file a joint status report within 60 days. If at any time in before then  
4 it becomes apparent that resolution between the parties is not feasible, the parties will submit a  
5 proposed schedule to the Court for motion practice.

6 IT IS SO STIPULATED, THROUGH PARTIES OF RECORD.

7 DATED this 29th day of November, 2022.

8  
9 NICHOLAS W. BROWN  
United States Attorney

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20 *Attorney for Plaintiff*

## ORDER

**IT IS SO ORDERED.**

Dated this 30th day of November, 2022.

Skate Vaughan

S. KATE VAUGHAN  
United States Magistrate Judge